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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

vs.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendants.

Case No. CV 20-02291 DOC (KES)

**DEFENDANTS' JOINT
STIPULATION REQUESTING THE
COURT APPROVE THE BINDING
TERM SHEET AND VACATE THE
PRELIMINARY INJUNCTION**

**JOINT STIPULATION TO APPROVE TERM SHEET AND VACATE
INJUNCTION**

Case No. CV 20-02291 DOC (KES)

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JOINT STIPULATION TO APPROVE TERM SHEET AND VACATE
INJUNCTION
-1- Case No. CV 20-02291 DOC (KES)

TO THE COURT, ALL PARTIES, AND ATTORNEYS OF RECORD:

Defendants City of Los Angeles and County of Los Angeles (together, “Defendants”), by and through their respective counsel, hereby stipulate to the following:

RECITALS

WHEREAS, on May 22, 2020, the Honorable David O. Carter issued a Preliminary Injunction directing Defendants to offer housing to people experiencing homelessness (“PEH”) camped within 500 feet of freeway overpasses, underpasses, or ramps and to humanely relocate those individuals at least 500 feet away from such areas by no later than September 1, 2020 [Dkt. 123];

WHEREAS, on May 28, 2020, Defendants filed their Joint Request of City of Los Angeles and County of Los Angeles for Order to Mediate (“Joint Request”) [Dkt. 124];

WHEREAS, on May 29, 2020, the Honorable David O. Carter granted Defendants’ Joint Request, and appointed the Honorable André Birotte Jr. to serve as the mediator [Dkt. 125];

WHEREAS, on May 29, 2020, the Honorable André Birotte Jr. issued an Order Setting Briefing Schedule and Mediation (“Scheduling Order”) [Dkt. 127];

WHEREAS, Defendants participated in a mediation with the Honorable André Birotte Jr. on Thursday, June 11, 2020 at the County of Los Angeles’ Hall of Administration and on Friday, June 12, 2020 at Los Angeles City Hall;

WHEREAS, as a result of the mediation, Defendants agreed to a binding term sheet to provide 6,000 beds within 10 months, and an additional 700 beds within the following 8 months (6,700 beds in total within 18 months) of the execution and approval of the agreement to house or shelter (i) PEH living within 500 feet of freeway overpasses, underpasses and ramps, and then to give priority to providing housing or shelter to (ii) PEH 65+ within the City of Los Angeles, and (iii) other vulnerable PEH within the City of Los Angeles (“Binding Term Sheet”);

WHEREAS, an executed copy of the Binding Term Sheet was submitted to the

JOINT STIPULATION TO APPROVE TERM SHEET AND VACATE
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mediator, the Honorable André Birotte Jr.;

WHEREAS, on June 18, 2020, the Honorable David O. Carter discussed the Binding Term Sheet with the parties at a court hearing;

WHEREAS, Defendants will execute any and all necessary documentation to effectuate the Binding Term Sheet; and

WHEREAS, the Binding Term Sheet is subject to court approval, monitoring, and enforcement.

STIPULATION

NOW THEREFORE, IT IS HEREBY STIPULATED that Defendants jointly and respectfully request that the Court:

1. Approve the Binding Term Sheet;
2. Enter such further orders as necessary and appropriate to monitor and enforce the Binding Term Sheet and associated documentation; and
3. Vacate the Preliminary Injunction [Dkt. 123].

IT IS SO STIPULATED.

DATED: June 18, 2020

MARY C. WICKHAM

/s/ Lauren Black

Lauren M. Black
Principal Deputy County Counsel
COUNTY OF LOS ANGELES

DATED: June 18, 2020

MIKE FEUER, City Attorney

/s/ Scott Marcus

Scott Marcus
Senior Assistant City Attorney
CITY OF LOS ANGELES

Filer's Attestation: Pursuant to Local Rule 5-4.3.4(a)(2)(1), Byron J. McLain hereby attests that concurrence in the filing of this document and its contents was obtained from all signatories listed above.

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